1	definition, just visual definition of "ghosting."
2	Okay. Prior to KOKS going on the air, did you ever
3	observe any ghosting on Channel 15?
4	A There probably were times, weather
5	interference or something, when there was ghosts on all
6	of them. But at times they were all good.
7	Q Okay.
8	A Not all the time ghosting, but you know
9	weather has an effect.
10	Q Okay. Let's just take the channels that you
11	named there. Channel 6. Can you describe the picture
12	that you normally were seeing on Channel 6 on your TV
13	set?
14	MR. SHOOK: Now that is before KOKS began
15	broadcasting?
16	BY MR. DUNNE:
17	Q Yes, we are talking about before KOKS began
18	broadcasting.
19	A Well, I could watch it without great effort
20	to try to see figures and things on it.
21	Q Okay. Was it a clear picture? Did it have
22	snow in it?
23	A Well, I don't know what is perfect and what
24	isn't.
25	Q No, I am asking for your opinion. I want you

to describe, if you can, the picture that you saw. 1 | Just describe it. Was it clear? Did it have snow in 2 it? Did it have ghosts in it? Was the color always 3 good? 4 5 I think as a rule it was good, because we 6 would like to watch the news on that. Okay. Was that -- you mentioned the 7 stations, your signals would kind of fade in and out, 8 9 or they would be stronger one day and stronger the Is that accurate, that some days you would get 10 11 Channel 6 better than others? 12 It has been quite a while, Mr. Dunne. Α 13 Okay. 0 14 Α It has been about four years. 15 Well, I am asking you to the best of your 16 recollection, Mrs. Wynn. 17 Α Well, what I am trying to say to you is that there was times on that television when we would get 18 19 Memphis and St. Louis, if the weather conditions were 20 right. There were times when we couldn't get them. 21 There was times when -- there's always times in a 22 rural, where we are this far from the station, is when 23 television is not perfect. And now I can't sit here 24 and say that they were perfect all of the time, all of 25 them. I am trying to be as truthful as I can about it.

1	Q Well, I am also trying to get you to describe
2	the picture that you saw, Mrs. Wynn, and I guess I am
3	not doing too well at it. Is it your testimony then
4	that your normal picture on Channel 6 was a clear
5	picture without any snow or lines?
6	A Well, there I am saying that the most of
7	the time it was good, good enough that we could enjoy
8	watching Channel 6. It was one of our regular channels
9	that we did watch. And I don't like to watch one if I
10	can't see it.
11	Q Was that the only NBC affiliate that you
12	received, ma'am, Channel 6 in Paducah?
13	A What is Jonesboro?
14	Q I'm asking you.
15	A Well, I think that Jonesboro is also the
16	same. I think 15 is ABC, if I remember right. Fifteen
17	and Jonesboro are the same.
18	Q Fifteen and Jonesboro are the same?
19	A They were both, whichever one they are.
20	Q Okay.
21	A NBC or whatever. No, ABC.
22	Q Okay. You say that after KOKS began
23	broadcasting, "I could no longer watch Channel 6 or 8."
24	Do you know when KOKS began broadcasting?
25	A It was in the fall of '88.

1	Q You don't remember specifically?
2	A It seems like it was in September probably.
3	Q Okay. Describe how you how did you know
4	that KOKS came on the air?
5	A Well, of course, I was there in the
6	neighborhood, you know, and I know that the tower was
7	going up, and the word was just around the community
8	that the radio station is going to be on the air right
9	away. You know, we were all aware.
10	Q Okay.
11	A In fact, I was like ever so many other
12	people. I was looking forward to the radio station.
13	Q Okay. When you say, "After KOKS, I could no
14	longer watch Channel 6 or 8." Can you describe? As
15	best as you can, I want you to describe what you saw on
16	Channel 6 when you turned it on after KOKS came on the
17	air.
18	A It was just, you couldn't see a picture.
19	Q It was blanked out?
20	A It was just lines totally. You couldn't see
21	a figure on it all, a person or anything that you could
22	recognize.
23	Q Okay. You say there were lines on it. Were
24	these lines distinctive in any way?
25	A Well

1	Q Do they run up and down, sideways or zig-zag?
2	Or do they have a usual sort of pattern to them?
3	A It was more like well, there was cross
4	lines and dots and blobs and everything. It was just
5	totally there was just nothing on there that you
6	could see.
7	Q Okay. And how about Channel 8? What did
8	Channel 8 look like?
9	A It was a little better than 6, but it would
10	still have the crossways lines and all of the
11	interference and double figures and had no color.
12	Q Okay. Describe Channel 12 and 15. How did
13	Channel 12 look to you?
14	A Of course, it was always our best channel,
15	and it was better than 6 or 8.
16	Q And better than 15 too?
17	A It always was, you know, up to that time. We
18	didn't watch 15 very much.
19	Q Okay. Now you say, "When KOKS began
20	broadcasting, I could not listen to KKLR." You
21	couldn't listen to KKLR on what?
22	A On the radio.
23	Q You had a radio in your home?
24	A Yes.
25	Q Okay. What frequency is KKLR on? Do you

1	know?
2	A I think it is 94.5.
3	Q Okay. Was there any other frequency, to your
4	knowledge, that was affected other than that one?
5	A KOKS came on all the way across the whole
6	dial, just all the way. Not, maybe not every station,
7	but many stations across.
8	Q Okay. Prior to I am referring to page 3
9	of your testimony, paragraph 4, Mrs. Wynn. Okay.
10	Prior to signing the document on December 4, 1988,
11	which is Attachment 1, did you call the radio station?
12	This was prior to signing the document.
13	A I can't remember exactly when I called the
14	radio station.
15	Q Okay.
16	A But it was either I know that Mrs. Stewart
17	came to my house. It was like the first two months of
18	'89.
19	Q Okay. So you had called the station either
20	right before or right after you signed this document.
21	Is that correct?
22	A Let's see. Now if I can find my
23	Q Sure. It is page 7 of the exhibit.
24	A Let's see. I would say that I most likely
25	signed this document before I called the radio station.

1	Q Okay, good. Do you remember how you got this
2	document to sign? That is a "do you recall" question?
3	Do you remember?
4	A Either Doris Smith or Jean Hillis would have
5	got this to me. Whether it was mailed or handed to me,
6	I don't remember.
7	Q Okay. And you called the station, you just
8	testified, you thought after you signed this document.
9	You told "my reception problems." If you recall, what
10	did you tell the who did you talk to at the station?
11	A I believe it was Mrs. Stewart.
12	Q Okay. Do you remember the conversation at
13	all, ma'am?
14	A Well, I told her that I was having problems
15	with the radio station interfering with my TV and my
16	radio.
17	Q Okay. Now you remember specifically that you
18	mentioned your radio?
19	A Well, I'm sure I did.
20	Q Okay. Did you mention, if you recall now, if
21	you remember that conversation, do you remember what
22	you said to Mrs. Stewart about the TV, your reception
23	problems with your TV?
24	A No, I don't remember exactly, but I am sure I
25	would have said that I was having you know, my

1	reception had, was bad.
2	Q Okay. If you don't remember, Mrs. Wynn, you
3	don't remember. If you do remember
4	A Well, that's the only reason I would have
5	called her, would have been to tell her that.
6	Q But you don't remember specifically what you
7	told her about your reception problems? You don't
8	recall the conversation now, do you? Or do you?
9	A No, I don't remember exactly.
10	Q Okay. If you don't recall, then you don't
11	recall.
12	A I'm just judging by what I would ordinarily
13	do.
14	Q Okay. Mrs. Stewart came to your house in
15	January 1989?
16	A It was the first part of the year, and I
17	can't remember an exact date.
18	Q Okay. But you recall that it was in January?
19	A It was January or February, one.
20	Q Okay.
21	A It was the first part of the year.
22	Q Okay. Do you recall you say that
23	Mrs. Stewart installed a filter. Do you recall what
24	that filter looked like?
25	A The one on the TV was a piece of flat like

1	antenna lead-in wire.
2	Q Uh-huh.
3	A Is what it looked like to me, and it was, you
4	know, about so long.
5	Q Uh-huh.
6	A And she put that on the back of my
7	television, back where the antenna hooks on.
8	Q Okay. And did that help it?
9	A Well, there was somewhere in the neighborhood
10	of four or five hours of viewing when it was better.
11	Q It made an improvement for four or five
12	hours. And then did something happen that it stopped?
13	A Then it was just like it was before.
14	Q Was there anything
15	A I couldn't understand why that it would work
16	for four hours and no more. But it was I well, I
17	am not an engineer, but I can't see, and I couldn't see
18	then, how that could possibly help.
19	Q Okay. And when it stopped helping, as you
20	say, did you leave it there, take it off or what?
21	A I left it there for a while. It didn't it
22	just stayed there. It didn't help and it didn't hurt.
23	It was just there. And I don't like to do much behind
24	a television set.
25	Q Okay. And you recall that you specifically

mentioned to Mrs. Stewart that you had problems with your radio? 2 3 Α Yes. And can you describe for us what she did or 4 did not do? 5 6 Well, I have the thing here that she put on 7 the radio. 8 Q You do? 9 Yes. Α 10 If you have got it, why don't we see it? Q 11 Α This is it, and the plug-in cord, electrical 12 cord, ran -- she looped it through here and plugged it back in. 13 Okay. Did she give it a name that you 14 15 overheard? Did she call it something, a particular kind of filter? 16 If she did, I didn't understand because I 17 18 don't know those things. 19 Q Okay. But you don't recall a name that she 20 qave it? 21 Α No, I do not. 22 Okay. And to your recollection, the 23 installation of that particular device had no effect on 24 your reception?

No, it did not. It was no help.

25

Α

1	Q	Did you listen to the various FM stations
2	afterward	and
3	A	Yes.
4	Q	and the result was, there was no result at
5	all?	
6	A	It just didn't help at all.
7	Q	Okay.
8	A	It was the same. In fact, the only thing
9	that helpe	ed was when I acted as an antenna to that
10	radio with	n my own body.
11	Q	Why don't you how did that work, Mrs.
12	Wynn?	
13	A	Well, my bed was a twin bed, and the radio
14	was over o	on the back side. Now if I would stand on
15	this side	and reach over and aim at the radio and aim
16	up this wa	y with my legs, then I had a good antenna and
17	it worked	fine. And Mrs. Stewart remembers. And I
18	said, "Obv	riously, I can't do this all the time."
19	Q	It sure makes listening to bedtime music
20	difficult,	doesn't it?
21	A	Yes. At that time my radio was real
22	important	to me. I listened to it all the time that I
23	was home.	
24	Q	Okay. Now, Mrs. Wynn, in paragraph 5 you
25	mention th	at you don't recall a representative of KOKS

1	coming to	your home after that first visit. Is that
2	correct?	Or coming to install a trap filter in April
3	of 1989?	
4	A	If she came in April, then that was the first
5	time she	came. She came to my house two times.
6	Q	And only two times?
7	A	That is correct.
8	Q	Okay. Do you recall, Mrs. Wynn, if you
9	mentioned	to Mrs. Stewart it was Mrs. Stewart who
10	came to y	our house each time? Is that correct?
11	A	Yes.
12	Q	Okay. So whenever we talk about KOKS coming
13	to your h	ouse, we are talking about Mrs. Stewart?
14	A	Yes. She is the only that came.
15	Q	Okay. Did you know Mrs. Stewart before you
16	spoke wit	h her about your problems with your TV
17	reception	?
18	A	No.
19	Q	Did was there a time that you recall that
20	you spoke	to Mrs. Smith [sic] while she was at your
21	home conce	erning any health problems you may have had?
22		MR. SHOOK: Your Honor?
23		JUDGE STIRMER: I think you misspoke. You
24	mean Mrs.	Stewart rather than Smith, don't you?
25		MR. DUNNE: Yes, I'm sorry.

1	JUDGE STIRMER: Okay.
2	MR. DUNNE: Yes, thank you. Let me rephrase
3	that so that we can all be equally confused.
4	BY MR. DUNNE:
5	Q Did there come a time when Mrs. Stewart came
6	to your home and you may or may not have discussed with
7	her some health problems that you had? Do you recall
8	the first time that she was there mentioning any health
9	problems that you may have had?
10	A If that was in January or February of 1988,
11	then I can tell you that my husband was having bad
12	health problems.
13	Q Okay. But you never discussed with her, to
14	your recollection, any health problems that you may
15	have had?
16	A I don't recall.
17	Q Okay. If you don't recall, ma'am, you don't
18	recall.
19	A No, I don't.
20	Q That's all we can ask of you.
21	A I remember at one time that we talked about
22	something, and she said, "Well," something to the
23	effect that "I will pray for them or you or whoever,"
24	whatever it was. I remember that.
25	Q Okay. Mrs. Wynn, you say, "I do not recall

any such visit," meaning a second visit. You have a 2 very distinct recollection of only two visits to your 3 home by Mrs. Stewart? Α That's right. Okay. You don't recall that Mrs. Stewart put 5 Q in another filter on your TV set, one that was square? 7 It looked like this, with basically prongs coming out 8 at both ends? 9 Α The one that I recall was the second time she 10 came to my house, and at that time I had a second 11 television that was in the bedroom. 12 Q Uh-huh. 13 Α And she put a filter on that one. 14 Okay. And that filter was kind of a round 15 filter? Is that correct? 16 If I am not mistaken, it is this square one right here. 17 18 Okay. Could we take that out and take a look 0 19 at that, Mrs. Wynn? 20 Yes, you may. Α 21 If you look at that, Mrs. Wynn, can Okay. 22 you read what it says on the front part of it right 23 here? 24 It says "FM trap, out." Α 25 Okay. And that was a different filter than Q

the one that Mrs. Stewart installed the first time, which was you have described as a string filter? 2 that correct? 3 Α Yes. Okay. Were there any other filters that Mrs. 5 Q 6 -- I notice you have got quite a collection there. 7 Were there any other filters that Mrs. Stewart 8 installed on your TV sets? 9 Α Not a filter. She put this, you know, 10 apparatus on it, which made it easier to plug and 11 unplug my antenna wire, because I unplug it when it 12 storms. 13 Q Okay. I notice specifically, Mrs. Wynn, is that round silver thing at the bottom of that. 14 15 Α Uh-huh. 16 Can we pull that out for just a minute? 17 Α Yes, you may. Now this is the one that A-1 Electronics, my television man, put on. 19 Q Okay. Can we take a look at that for a 20 minute? Why don't you read into the record what that is? 21 22 Α Okay. It says, "Fastrap," F-A-S-T-R-A-P, "5KFM-89.5." 23 24 And what is the company name at the bottom of 25 that, Mrs. Wynn?

1	A Microwave Filter Company Incorporated.
2	Q Okay. And is it your testimony that A-1
3	Electronics put that filter on your set?
4	A Yes.
5	Q And is it also your testimony that KOKS,
6	Mrs. Stewart specifically, put that square filter, the
7	FM trap, on your TV set?
8	A Yes, a different set.
9	Q A different set?
10	A Okay. This one from May 1 was put on my main
11	set, and she put that one on the extra one.
12	Q Okay. So when your testimony, paragraph 6,
13	when you say that you had A-1 Electronics come to your
14	home to repair your TV set, the filter they installed
15	was that FM trap filter from Microwave Electronics?
16	A Yes. He was repairing another problem, and
17	he said, "I have a filter that may help." And he put
18	it on, and I have the bill here that the filter itself
19	was \$50, which did not include the labor.
20	Q Okay. Does it identify the name of the
21	filter on that receipt, Mrs. Wynn?
22	A It says, "Filter FM."
23	Q That is all it says? It doesn't say 89.5 or
24	anything like that?
25	A No.

1	Q Okay. There came a time, from your
2	testimony, Mrs. Wynn, that evidently you called
3	Mrs. Stewart up and asked her to pay for that?
4	A I asked her if she would.
5	Q And what was her response?
6	A She said, "No, we can't do that."
7	Q She told you, "No, we can't do it"?
8	A That's right. And that's when, at that time
9	or sometime shortly after that, that she made an
10	appointment to come to my house.
11	Q Okay. Why don't you describe what happened,
12	Mrs. Wynn?
13	A She came over and she looked at this behind
14	the television and helped put this other little doodad
15	on here that helps hook up the antenna wire. And then
16	she went and got this other square filter and put it on
17	the second television set.
18	Q Okay. But she didn't replace your filter?
19	Is that what you are saying?
20	A No. Some way I was of the understanding that
21	they were supposed to put a filter on every television
22	set in the house. And since one had a good one, then
23	she just put it on the other one.
24	Q Okay. When she installed the filter on the
25	second TV set, your testimony is that there was no

change in reception? 1 2 Α No. No change at all? 3 0 No. Α 5 Were you still having problems with your 6 radio at that time? 7 There were times that I had troubles No. 8 with the radio, but in all honesty the radio reception 9 improved after a while, after KOKS was in there. 10 mean, it was real bad when they first came on the air, 11 and then in time it did let up a little. I don't know 12 whether they cut the power down or what. It seemed like at first when it first went on the air that the 13 14 whole, the whole air, the whole mobile home, everything 15 was just full of something. I can't tell you what, 16 whether it was radio waves or what, but they were extreme with everything, with everything that made 17 18 The radios, the telephone, tape players or sound. 19 anything. And it was like that they may have cut down 20 the power or improved it or something. 21 Q Okay. 22 As far as the radio was concerned. Α 23 Mrs. Wynn, why don't we stick with what you 24 know? You are speculating in saying they may have cut 25 the power.

1	A Well
2	Q But you did observe that there was an
3	improvement at least in your radio reception. Is that
4	correct?
5	A Yes. Not ever perfect, but certainly it did
6	improve, and I am being honest with you. I am not
7	going to say everything was bad because it, you know
8	Q Okay. When Mrs. Stewart came to your home in
9	September of 1991, as you say in your testimony, were
10	you still having problems with your radio? And it is
11	your testimony that it improved between the time it
12	came on the air and the time
13	A There were times when I did have problems,
14	but at least I could listen to my radio without it just
15	aggravating me to death, because I like good sound.
16	Q Okay. When you say there were times, how
17	often were these times?
18	A Who knows? I didn't time them.
19	Q Well, I mean, was it often or seldom or once
20	a week or once a day? Or how often did you notice it?
21	A Of course, I worked and I wasn't there all
22	the time, but there would be and I couldn't even say
23	that it was a regular time. But there were just times
24	when I had interference to where the sound was bad.
25	Q Okay. And sitting here now today, you can't

1	remember how often this occurred in September 1991?
2	A I couldn't say to you whether it was once a
3	week or once a month or
4	Q Okay.
5	A There was no pattern to it.
6	Q Okay. Now you testified that you live close
7	to the Highway Patrol tower. Is that correct?
8	A Yes.
9	Q Okay. Did you ever notice any interference
10	on your TV set during this time that kind of came and
11	went, that would be described as intermittent? For
12	example, did you hear any clicking on your TV set like
13	a key being depressed?
14	A No.
15	Q Mrs. Wynn, I'm sorry. How far did you say
16	you were from the Highway Patrol tower?
17	A I can't tell you exactly.
18	Q I am asking for approximate. I know you are
19	not a surveyor.
20	A Oh, I don't know. Let's see. I am trying to
21	figure out I walked a lot, and I measured some
22	directions. I didn't measure that direction. A
23	quarter of a mile or more.
24	Q Okay. When Mrs. Stewart came to your home in
25	September of 1991, do you recall now mentioning to her

that you needed, that you were having problems with 1 your FM radio? 2 I can't tell you exactly. I don't remember 3 Α talking about it, because I didn't complain any more 4 about the radio. I was just accepting it as it was. 5 Mrs. Wynn, going back to the -- I am trying 6 7 to put this in perspective. Was there ever a time that you were afraid during this time period where you 8 believed that you have some health problem having to do 10 with cancer? 11 Α Well, let's see. In April? Let's see. 12 I'm trying to get my years straightened out. Last 13 August I had had a mammogram. In February before that, 14 and let's see, and the February before that. remember. I was having problems. It was a possibility 15 that it was cancer, cancer of the breast. 16 17 0 I don't want to intrude in your Okay. 18 privacy, Mrs. Wynn, but I want to fix something in your mind. When you had those concerns about cancer, and we 19 20 will just leave what kind of cancer it was, do you remember when that first came about, when that 21 occurred? 22 23 It was in February. I believe it was a year Α ago in February. It would have probably been in '91. 24 25 Q It would not have been in 1989, to the best

1	of your recollection?
2	A No. I wasn't even aware of it at that time.
3	Q You testified earlier that your husband had
4	some health concerns. Might they have had something to
5	do with cancer?
6	A He died of cancer on March 1, 1988.
7	Q Mrs. Wynn, that square filter, that FM trap
8	filter that we referred to a little bit earlier, that
9	was installed on your second TV, I think your testimony
10	was. Is that correct?
11	A Yes.
12	Q You had two TVs? One had the round filter?
13	A Uh-huh, that I bought.
14	Q Okay. And the other one had the square
15	filter?
16	A Yes.
17	Q The FM trap filter. And I believe it was
18	your testimony that there was no change whatsoever in
19	your reception that you observed with the installation
20	of that square filter?
21	A Not that I could tell. I still couldn't
22	watch that television.
23	Q Okay. Where was that television?
24	A It was in the bedroom, just about through the
25	wall from the first television.

1	Q Okay. Describe the television for us. Was
2	it a small TV? A large TV? Did it have rabbit ears?
3	Was it hooked up to an antenna?
4	A I can't remember just how big it was. It was
5	a table model.
6	Q Uh-huh.
7	A A fairly new one, a color television. I
8	think RCA. And there was like a the one antenna
9	came into the house to the first TV, and then it went
10	from there to the second one.
11	Q Okay. So you had both TVs hooked up to
12	essentially an outside antenna, the same antenna?
13	A Uh-huh.
14	Q Do you remember why you had A-1 Electronics
15	out to your house?
16	A This says, tells on here something about what
17	they did to it. It says, "One fuse. Repaired remote
18	power supply."
19	Q Okay. But you don't recall now what specific
20	problem brought A-1 Electronics out to your house?
21	A Evidently the television wasn't working. I
22	can't tell you why now.
23	Q Well, you know, Mrs. Wynn, that is a "do you
24	remember" question. If you remember, you remember. If
25	you don't, you don't. Do you remember a specific

1	problem that brought A-1 Electronics out to your house?
2	A I can't tell you whether it was the picture
3	or the sound that was gone. I can't tell you.
4	Q Okay. If you don't remember, you don't
5	remember.
6	MR. DUNNE: Your Honor, I think I am almost
7	finished here. Just, may I have a moment's indulgence?
8	JUDGE STIRMER: Very well.
9	(Pause.)
10	BY MR. DUNNE:
11	Q Mrs. Wynn, if I could direct your attention
12	to your testimony, page 9 of your testimony. That
13	would be Attachment 2. Do you recall how you got this
14	petition, who you received this from, if anyone?
15	A Well, again, I don't know if it was through
16	the mail or by hand, but it was either Doris Smith or
17	Jean Hillis.
18	Q Okay. I will refer your attention again to
19	two pages in, page 11 of your testimony. Once again,
20	do you remember where you got this petition?
21	A Well, I would say
22	Q Don't say, Mrs. Wynn. If you remember where
23	you got the petition, I would like you to testify to
24	it. If you don't remember, you don't remember.
25	A No, I don't remember.

1	Q Okay. Let's go to Attachment 4, if we may.
2	That is page 14 of your testimony. Do you remember
3	where you got this petition?
4	A Let's see. No, I can't tell you.
5	Q Okay. It makes it much easier this way,
6	Mrs. Wynn. Let's go to page 16.
7	A I don't remember getting much through the
8	mail, and like I say, Jean Hillis was my main contact.
9	Q Okay. Now this appears to be a form, kind of
10	a form, informal objection, Mrs. Wynn.
11	A Uh-huh.
12	Q That you kind of filled in at the bottom.
13	A Uh-huh.
14	Q Is that correct? Is that an accurate
15	characterization?
16	A Yes, I believe that was notarized.
17	Q Okay. And where did you receive this form to
18	use, if you recall?
19	A Well, it was where the, where it was
20	notarized.
21	Q No, no.
22	A At the office.
23	Q Where did you if I am not making myself
24	clear, I will rephrase the question. This page itself
25	appears to be a form. In other words, that is not your